



GDPR and Data Protection Policy

Introduction

Under the EU General Data Protection Regulations (GDPR), OXSRAD is required to comply with GDPR. GDPR sets out seven key principles: Lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality (security) and accountability. OXSRAD endeavours to ensure any data is recorded and stored inline with these principles.

Data Controller

OXSRAD's Data Controller is the Operations Lead. They can be contacted at: admin@oxsrad.org

The Core Principles of the GDPR

These core principles have been summarised from Article: 5 of the GDPR. The OXSRAD will ensure that all personal data we hold will be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified and legitimate purposes and not processed in a manner that does not meet these purposes
- Adequate, relevant and limited to only what is necessary
- Accurate and kept up to date
- Stored for no longer than is necessary
- Processed and stored in a manner that ensures appropriate security of personal data, including protection against unauthorised and accidental loss, in line with our **Confidentiality Policy**.

Lawful Processing

OXSRAD will collect, hold and process all personal data in accordance with the GDPR for the following lawful purposes. In all cases the information collected, held and processed will include contact information (as defined in Appendix A).

By Consent: (Summarised from Article 6(1)(a) and Article 7)

OXSRAD collects and processes personal data when explicit consent is given by the individual. This applies to situations where individuals voluntarily provide their information for purposes such as marketing, communications, or participation in activities that require personal data collection. Consent must be freely given, specific, informed, and unambiguous, and individuals must be aware of what they are consenting to.

Examples include:

- Participation in promotional activities, such as photographs and videos for marketing purposes.
- Voluntary subscription to newsletters or communication updates.
- Consent to the processing of special categories of personal data (e.g., health information for specific events or services).

Individuals have the right to withdraw their consent at any time, and OXSRAD will ensure that the process for doing so is clear and straightforward.

By Contract:

This includes people who sell goods/services to OXSRAD and those that purchase our goods/services. The information collected will contain details of:

- The goods/services being sold to/purchased from OXSRAD and their use
- Bank and other details that are necessary and relevant to make and receive payments.

The information will be held and processed solely for the purpose of managing the contract between OXSRAD Ltd and the person for the supply of goods/services.

By Legal Obligation:

This includes people where there is a legal obligation on OXSRAD to collect, process and share information with a third party e.g. the legal obligation for OXSRAD to collect, process and share staff payroll information with HM Revenue & Customs (HMRC).

The following are other situations where OXSRAD has a legal obligation to collect, process and share information with a third party:

1. Taxation (HMRC)

For the purpose of managing an employee's PAYE and other tax affairs; the information collected will additionally contain the following information (as required by HMRC):

- National Insurance number
- Taxation Codes
- Salary/wages, benefits, tax deductions & payments
- Other information as required by HMRC

2. Pensions (NEST)

For the purpose of managing an employee's statutory pension rights, the information collected will additionally contain the following information (as required by NEST):

- National Insurance number
- Salary/wages, benefits, tax deductions & payments
- Other information as required by NEST

3. Training providers

For the purpose of providing training in line with statutory requirements, information collected could be shared with third party training providers.

However, this will normally only include contact information. Any additional information will only be given as required.

The information will be held and processed solely for the purpose of meeting OXSRAD's legal obligations.

By Vital Interest - matters of life and death

OXSRAD does not manage activities which require the collection, holding and/or processing of personal information for reasons of vital interest.

Public Task - public interest

This means carrying out a specific task in the public interest which is laid down by law. OXSRAD does not undertake any public tasks which require the collection, holding and/or processing of personal information.

Legitimate Interests

Photography and videography:

OXSRAD collects images of service users engaging in activities within its premises and other public locations for the purposes of marketing and fundraising. Where individuals are unable/do not want to have their pictures published, for safeguarding or other reasons, their pictures will be held on the OXSRAD drive but not published.

Where possible, users are asked beforehand if they consent to being in photos. Those with access to photographs will only distribute them in line with permissions given and GDPR laws.

Closed Circuit TV (CCTV) Recording:

OXSRAD collects CCTV footage and images of the centre and surrounding area in order to safeguard the premises from theft and vandalism. The information collected is only processed and, where appropriate, shared with the Board of Trustees and Police when it is necessary to investigate a potential crime.

Individual Rights

The following clauses are summarised primarily from the guidance provided by the Office of the Information Commissioner.

The right to be informed (summarised from Articles 12-14)

When collecting personal information OXSRAD will make available, free of charge, a privacy statement written in clear and plain language which is concise, transparent, intelligible and easily accessible containing the following information:

- Identity and contact details of the data controller
- Purpose of the processing and the lawful basis for the processing
- The legitimate interests of OXSRAD

- Retention period
- The existence of each data subject's rights
- The right to withdraw consent at any time, where relevant
- The right to issue a complaint

Where this data is collected directly from the data subject, the privacy statement will be provided at the time that the information is requested.

The right of access (summarised from Article 15)

Data subjects have the right to confirmation that their personal data is being processed by OXSRAD. Where this is the case, they also have a right to access their personal data and information detailed in the Confidentiality Policy.

The right to rectification (summarised from Article 16)

Data subjects have the right to require OXSRAD, without delay, to rectify inaccurate or incomplete personal data concerning themselves.

The right to be forgotten (summarised from Article 17)

Apart from cases where data is held to fulfil legal obligations or public tasks (such as DBS certificates), data subjects have the right to require OXSRAD, without delay, to erase any personal data concerning themselves.

However, OXSRAD maintains a policy of limiting access to those who have not provided the minimum level of personal data, i.e. completed registration forms, in line with our Safeguarding Practices.

The right to restrict processing (summarised from Article 18)

If there is ever a dispute between a data subject and OXSRAD about the accuracy, validity, or legality of data held by the charity, the data subject has the right to require that OXSRAD stops processing the data for a reasonable period of time to allow the dispute to be resolved.

The right to data portability (summarised from Article 20)

Where data is held for the purposes of consent or contract, data subjects have the right to require OXSRAD to provide them with a copy of their personal data in a structured, commonly used and machine-readable format.

Data Controller and Data Protection Office

A data controller is appointed by the Board of Trustees. If the Data Controller is absent, the Chair of the Trustees will act as the data controller. The Data Controller shall implement appropriate technical and organisational measures to ensure that

processing is performed in accordance with GDPR (summarised from Articles 24 & 25).

The scale and scope of the data collected and processed by OXSRAD does not justify the need for a separate Data Protection Officer (summarised from Article 37).

Privacy Policy

OXSRAD has a **privacy policy** which is available to everyone.

Appendix A: Important Definitions

Contact Information	Any or all of the person's full name (including preferences about how they liked to be called), full postal address, home phone numbers, mobile phone numbers, email addresses, and social media IDs (e.g. Facebook, WhatsApp, TikTok, Instagram, Snapchat and Zoom)
Data Subject	Other identifiable individuals that OXSRAD holds personal data about
Third party	Means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data
Consent of the data subject	Giving people genuine choice and control over how their data is used.

Post brexit - throughout this document, references to the General Data Protection Regulation (GDPR) are references to the original EU GDPR guidelines, and incorporate the amendments set out in the [Keeling Schedule](#).